

GHG Accounting Comments

Name	Affiliation	Hometown	State or Country
Frederick W Krueger	National Religious Coalition on Creation Care	Santa Rosa	CA
Jeff Ruch	Public Employees for Environmental Responsibility	Washington	DC
Debra Jacobson	Solar Institue, the George Washington University	Washington	DC

GHG Accounting Comments

Comment

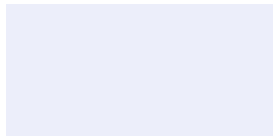
Thank you for taking this step toward the regulation of greenhouse gases. On behalf of a coalition of religious organizations, you should know that all major religious bodies in America support strong and vigorous regulation on greenhouse gases. The formal statements of the National Association of Evangelicals, the US Catholic Conference, the National Council of Churches, the Standing Committee of Orthodox Bishops in America, the Southern Baptist Convention, the Presbyterian Churches USA, the United Methodist Church, the Central Conference of American Rabbis, plus the Native American Indigenous Peoples' Coalition are unanimous in declaring to you and all people the importance of doing all things necessary to hold off the forces leading to rising greenhouse gas emissions and global climate change. In aggregate these organizations represent more than one hundred million citizens. Thank you for this action.

Link to comments: <http://www.whitehouse.gov/sites/default/files/microsites/ceq/PEER-8-2-10-GHG-Comments.pdf>

Dear Ms. Gillespie-Marthaler: Thank you for the opportunity to comment on the Draft Guidance for Federal Greenhouse Gas Accounting and Reporting and the related Technical Support Document, released by the Council on Environmental Quality. I am forwarding you a copy of a journal article that I co-authored with Dr. Colin High of Resource Systems Group because of its relevance to the Draft Guidance and related Draft Technical Support Document. This journal article was included in the inaugural issue of the Journal of Energy & Environmental Law and was published this spring by The George Washington University Law School and Environmental Law Reporter News and Analysis. The article is titled "U.S. Policy Action Necessary to Ensure Accurate Assessment of the Air Emission Reduction Benefits of Increased Use of Energy Efficiency and Renewable Energy Technologies." The article and its detailed recommendations are directly relevant to the treatment of scope 2 emissions under the Draft Guidance. In particular, the article supports (at least on an interim basis) the statement in Section 4.1 of the Draft Guidance relating to renewable energy that "GHG emission impacts should ...be based on the eGRID non-baseload output emission rates...." The article explains why the eGRID non-baseload methodology is far more accurate than the eGRID system average methodology (total output emission rate methodology) in measuring the greenhouse gas emission benefits of increased use of renewable energy and energy efficiency technologies. As stated in footnote 65 on page B-34 of the Technical Support Document, "[t]he reason for using the non-baseload emission factor is that non-baseload generation is most likely to be displaced by renewable energy generation, while baseload generation would generally be unaffected." At the same time, the article highlights recommended improvements that should be pursued following the

GHG Accounting Comments

Attachment



GHG Accounting Comments

Stephen Greene

Howland Greene
Consultants, LLC

Lowell

MA

GHG Accounting Comments

completion of the initial guidance to refine the eGRID non-baseload methodology and the benefits of allowing the submission of emissions data from certain other verified non-baseload methodologies at the outset (see pages 14 to 15 of article). Thank you for your consideration of this information. Sincerely, Debra Jacobson Co-Director Solar Institute The George Washington University djacobson@law.gwu.edu 202-994-1965
Attachment to Follow by U.S. Mail (1)

August 14, 2010 (submitted electronically to GHG.guidance@ceq.eop.gov)

Nancy H. Sutley, Chair, Council on Environmental Quality

Re: Comments on GHG Reporting Guidance Documents

Dear Chair Sutley,

Thank you for the opportunity to comment on the proposed GSA Draft *Federal GHG Accounting and Reporting Guidance* (Guidance) and Draft GHG Accounting and Reporting Guidance – Technical Support Document (TSD).

My comments will be brief and in three general areas:

Setting the Guidance Documents in context

General Support for both draft documents

Specific document comments.

Setting the documents in context:

The focus of these documents is Greenhouse Gases (GHG). The General Services Administration (GSA) needs to keep in mind that EO 31514 has a sustainability mandate that is broader than just GHG. The Guidance and TSD by their specific scope are Greenhouse Gas oriented. GSA and the Council on Environmental Quality needs to include the other components of EO 31514 as described in Section 2 and Section 8 as appropriate or plan for the inclusion of other listed sustainability criteria. GHGs are important but are not the only pieces in the puzzle.

It is reasonable and workable for a reporting agency to focus on Scope 1 and 2 emissions while beginning to include specific Scope 3 emissions. The GSA has selected the appropriate Scope 3 emissions at this time. The Guidance recognizes the important role of Scope 3 emissions and begins the process of collecting this diverse and extremely important information. Scope 3 emissions will likely dwarf Agency Scope 1 and 2 emissions. It is critical that the Federal Government signal the vendor base/supply community of the importance of Scope 3

GHG Accounting Comments

GHG Accounting Comments

GHG Accounting Comments

Scope 1 and 2 emissions. It is critical that the Federal Government signal the vendor base/supply community of the importance of Scope 3 requirements so the required information is gathered, and design and operation changes are made in a timely manner.

Another general comment is that while we have six listed GHGs, the guidance should state that these are the minimum and agencies should include other substance that are significant GHGs. Nitrogen trifluoride (NF3) is one such example that may be part of the agencies use or used in their supply chain. The idea being that reduction of GHGs is the objective, not just reduction of the listed GHGs.

The Draft Documents:

The proposed Guidance and TSD are an excellent start. They are based on established procedures and are comprehensive. I support these documents and have made some specific comments in the next section.

Specific Comments:

Guidance

Section 1.2 Agency Report – Agree with the need for an accurate inventory. Recommend that all agencies prepare the inventory even if some of the information is considered sensitive (or will be held as confidential), especially for defense and security related activities. Sensitive information would not be publicly available, but would be used by the department to make better operational decisions going forward.

Section 2.2.3 Scope 3 – The Guidance does state that Scope 3 GHG will be included. It should make this very clear by saying that Scope 3 emissions are recognized as a significant portion of an agency's GHG impact. By signaling the extent to which GSA is considering Scope 3, it can send a clear message to the reporting community. For example, inclusion of Medicare or Medicaid service providers as an example could go a long way to improving energy efficiency in the hospital/medical services area.

2.3 Deminimus The Guidance is correct in not assigning a numerical threshold. With 600,000 likely sources of GHG information, a threshold set to high can add up to a lot of GHG emissions being swept under the carpet.

4.0 Renewable Energy. Agree with the idea of getting credit for renewable energy use. I caution that new hydro should also be a used to encourage hydro technology that does not impact the run of the river.

4.3 Carbon Offsets. Agree that this should not be used at this time but may be available in the future.

6.0 V/V. Agree with the multilevel approach. With the TSD for guidance, the next concern is the impartiality of the people verifying the report.

Allowing 2nd party and 3rd party V/V provides flexibility and options for managing the financial cost of providing accurate reports. I

GHG Accounting Comments

GHG Accounting Comments

Adam Gendelman

U.S. Nuclear
Regulatory
Commission

Rockville

MD

GHG Accounting Comments

Dear Sir or Madam,

Pursuant to the *Federal Register* notice dated July 16, 2010 (75 FR 41452), I am responding on behalf of the Nuclear Regulatory Commission staff to the draft CEQ guidance document, dated July 2, 2010, entitled "Draft Federal Greenhouse Gas Accounting and Reporting Guidance."

The NRC Staff has no comments on the draft guidance.

Thank you,

Adam Gendelman

Attorney

Reactor and Materials Rulemaking

Office of the General Counsel

U.S. Nuclear Regulatory Commission

GHG Accounting Comments

GHG Accounting Comments

David M. "Max" Williamson	Carbon Offset Providers Coalition	Washington	DC
Greg	Myself	Berkeley	CA

GHG Accounting Comments

Link to comments: <http://www.whitehouse.gov/sites/default/files/microsites/ceq/COPC-Comments-re-CEQ-GHG-Inventory-Guidance.pdf>

Federal agencies should be allowed to buy AB 32 allowances to make temporary progress towards their EO compliance obligations.

An appropriate mechanism would allow federal agencies to buy allowances in a manner that empowered the federal government to support states like California by "right sizing" the price of their allowances.

A "well designed" mechanism for federal agency procurement of state and regional allowances would also dampen volatility in a market that may initially need a leash.

My market friends and colleagues would not like this concept (nor would my capped friends, nor my enviro friends), but I think Mary Nichols and Nancy Sutley might get a kick out of this because it could give the federal government a credible role in fostering and financing the successful demonstration of domestic cap and trade.

\$1.97 RGGI credits have not helped the offset markets nor have they produced a meaningful price signal.

Cap and trade is nothing unless it is an engine for steadily and steadfastly increasing the price of carbon.

If the federal govt is willing to use its procurement power to right size the allowance prices in emerging cap and trade markets (while concurrently achieving cost-effective compliance with the EO), then the state and regional cap and trade designers and implementers can loosen the screws a bit in their initial designs, potentially turning local opponents into proponents.

Federal procurement dollars should only be allocated towards procuring allowances from state and regional cap and trade program that meet yet to be developed conformance requirements to be set by this Administration.

Those states and regions that can meet the conformance requirements would then be free to (1) receive federal procurement dollars and (2) use the federal procurement dollars like an accelerator pedal, moving local carbon prices up to but not past desired levels that induce

GHG Accounting Comments



GHG Accounting Comments

Lane Burt	USGBC	Washington	DC
-----------	-------	------------	----

Pamela A. Lacey	American Gas Association	Washington	DC
-----------------	--------------------------	------------	----

Joe Indvik	ICF International	Washington	DC
------------	-------------------	------------	----

GHG Accounting Comments

use the federal procurement dollars like an accelerator pedal, moving local carbon prices up to but not past desired levels that induce responsible market behaviors.

The objective is not to control the market - it is to create the market. Just as we all learned to ride with training wheels, now we must begin to learn how to do cap and trade. The problem is not about falling though (that is a different problem) - the problem is getting started. The EO could be the catalyst that states and regions need to move forward with cap and trade.

For those of us who have waited so long for leadership by the federal government, here is an novel opportunity. I challenge you to consider it.

I do not feel the same way about RECs and offsets.

Link to comments:

<http://www.whitehouse.gov/sites/default/files/webform/USGBC%20Comments%20on%20CEQ%20GHG%20Accounting%20Guidance.pdf>

Link to comments: <http://www.whitehouse.gov/sites/default/files/microsites/ceq/AGA%20Attachment%20-%20EPA%20Energy%20STAR%20Source%20Energy%20Methodology.pdf> and

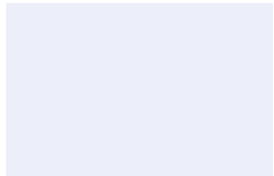
<http://www.whitehouse.gov/sites/default/files/microsites/ceq/AGA%20Comments%20CEQ%20Federal%20GHG%20Guidance%20Sept%201%202010.pdf>

To Whom it May Concern:

I found two significant typos in the “DRAFT Federal Greenhouse Gas Accounting and Reporting Guidance” technical support document:

- On Page C-13 in the Contracted Municipal Solid Waste Disposal section, Equations C-4 and C-5 give a default value of 1% for the methane correction factor (MCF). This factor is intended to represent the methane generation potential of a landfill. However, “Annex 3: Methodological Descriptions for Additional Source or Sink Categories” of the U.S. GHG Inventory says the fraction defaults to 1 (i.e. 100%) for anaerobic managed sites (p. A-304), which can be assumed to describe most sites in the U.S. It defaults to 100% in the FEMP Energy and GHG Reporting Workbook as well.

GHG Accounting Comments



GHG Accounting Comments

Arnold Wellman, V.P. Corporate Public Affairs	United Parcel Service	Washington	DC
---	--------------------------	------------	----

Michael Kennedy	Progress Energy	St. Petersburg	FL
-----------------	-----------------	----------------	----

Douglas J. Fulle, Vice President, Environmental Affairs	Oglethorpe Power Corporation	Tucker	GA
--	---------------------------------	--------	----

Kyle Gibeault	Renewable Energy Markets Association	Washington	DC
---------------	---	------------	----

Glenn Adler	Service Employees International Union	Washington	DC
-------------	--	------------	----

Kerry Hewitt	Biomass Power Association	Portland	ME
--------------	------------------------------	----------	----

Jason Walsh	BlueGreen Alliance	Washington	DC
-------------	--------------------	------------	----

Brian Siu	Natural Resources Defense Council/Sierra Club/National	Washington	DC
-----------	---	------------	----

GHG Accounting Comments

- On Page C-10 in the Transmission and Distribution Losses section: "This default methodology currently uses a national average T&D loss of 0.618 (or 6.18 percent) and Equation C-1 to determine the electricity loss adjustment factor." The decimal that corresponds to 6.18% is .0618, not .618.

Link to comments:

<http://www.whitehouse.gov/sites/default/files/webform/COMMENTS%20SUBMITTED%20BY%20UPS%20ON%20Draft%20Guidance%20for%20Federal%20Greenhouse%20Gas%20Reporting%20and%20Accounting.pdf>

Link to comments:

<http://www.whitehouse.gov/sites/default/files/webform/Progress%20Energy%20Comments%20on%20Draft%20CEQ%20Biomass%20GHG%20Reporting%20Guidance.pdf>

Link to comments:

<http://www.whitehouse.gov/sites/default/files/microsites/ceq/100831%20Comments%20of%20OPC%20to%20CEQ%20on%20GHG%20Accounting%20and%20Reporting%20Guidance.pdf>

Link to comments: <http://www.whitehouse.gov/sites/default/files/webform/REMA%20Comments%20to%20CEQ%2C%209.1.2010.pdf>

Link to comments:

http://www.whitehouse.gov/sites/default/files/webform/SEIU%20Comments%20on%20Draft%20Federal%20GHG%20Accounting%20and%20Reporting%20Guidance_Sept%202010.pdf

Link to comments: [http://www.whitehouse.gov/sites/default/files/microsites/ceq/2010%2009-](http://www.whitehouse.gov/sites/default/files/microsites/ceq/2010%2009-01%20BPA%20comments%20to%20CEQ%20RE_%20Federal%20Greenhouse%20Gas%20Accounting%20and%20Reporting.pdf)

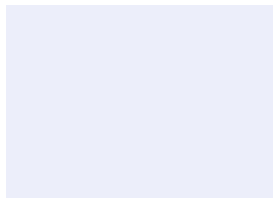
[01%20BPA%20comments%20to%20CEQ%20RE_%20Federal%20Greenhouse%20Gas%20Accounting%20and%20Reporting.pdf](http://www.whitehouse.gov/sites/default/files/microsites/ceq/2010%2009-01%20BPA%20comments%20to%20CEQ%20RE_%20Federal%20Greenhouse%20Gas%20Accounting%20and%20Reporting.pdf)

Link to comments: <http://www.whitehouse.gov/sites/default/files/microsites/ceq/BGA%20Comments%20GHG%20AccountingReporting.pdf>

Link to comments:

<http://www.whitehouse.gov/sites/default/files/microsites/ceq/NRDC%20Sierra%20NWF%20Comments%20on%20Draft%20GHG%20Accounting.pdf>

GHG Accounting Comments



GHG Accounting Comments

Wildlife Federation			
Michael Van Brunt	Covanta Energy	Fairfield	NJ
Peter Ashcroft	Environmental Defense Fund	Washington	DC
Mary Krueger	The Wilderness Society	Washington	DC
Joseph Seymour	Biomass Thermal Energy Council	Washington	DC
Lane Burt	USGBC	Washington	DC
Arthur O'Donnell	Center for Resource Solutions	San Francisco	CA
Michael Baghoomian	Northrop Grumman Corporation	Clearfield	UT
Manning Feraci	Vice President of Federal Affairs, National Biodiesel Board	Washington	DC
Manning Feraci	Vice President of Federal Affairs, National Biodiesel Board	Washington	DC

GHG Accounting Comments

Link to comments: <http://www.whitehouse.gov/sites/default/files/webform/2010-09%20Covanta%20Comments%20Draft%20CEQ%20GHG%20Reporting%20Guidance.pdf>

Link to comments:

<http://www.whitehouse.gov/sites/default/files/webform/Final%20EDF%20Comments%20on%20Federal%20GHG%20Reporting%20and%20Accounting.doc>

Link to comments: <http://www.whitehouse.gov/sites/default/files/webform/9-1-10%20TWS%20et%20al%20final%20draft%20CEQ%20GHG%20Rpting%20comments.doc>

Link to comments: http://www.whitehouse.gov/sites/default/files/webform/BTEC_CEQ_Carbon_Comments_09.01.2010.pdf

Link to comments: <http://www.whitehouse.gov/sites/default/files/webform/USGBC%20EA%20REPORT.pdf>

Link to comments:

<http://www.whitehouse.gov/sites/default/files/webform/CRS%20Comments%20on%20CEQ%20RE%20Guidance%20Document%209-1-10.pdf>

Do you anticipate that the date of Jan 31, 2011 for FY Baseline GHG emissions data submittal be pushed back since this Guidance document might not be finalized for a few more months? Will there be calculations samples provided, maybe as an appendix, for Scope 1, 2 and 3 emissions as a some type of guidance to standardize calculations methods? Why is 3rd party Verification only optional at this time for GHG Validation? Will there a website so the general public can look up and track GHG emissions data by agency and their reduction goals? Maybe some type of executive dashboard concept. Thank you.

Link to comments:

<http://www.whitehouse.gov/sites/default/files/webform/NBB%20Comments%20on%20CEQ%20GHG%20Accounting%20and%20Reporting%20Guidance%20-%209-1-10%20FINAL.doc>

Link to comments: <http://www.whitehouse.gov/sites/default/files/webform/ELCAofSoybeanBiodiesel91409.pdf>

GHG Accounting Comments

GHG Accounting Comments

	Board		
Manning Feraci	Vice President of Federal Affairs, National Biodiesel Board	Washington	DC
Manning Feraci	Vice President of Federal Affairs, National Biodiesel Board	Washington	DC
Manning Feraci	Vice President of Federal Affairs, National Biodiesel Board	Washington	DC
Jerry Schwartz	American Forest & Paper Association	Washington	DC

GHG Accounting Comments

Link to comments: <http://www.whitehouse.gov/sites/default/files/webform/20081216-gen393.pdf>

Link to comments: http://www.whitehouse.gov/sites/default/files/webform/Soy-Life-Cycle-Profile_-WhitePaper-.pdf

Link to comments: <http://www.whitehouse.gov/sites/default/files/webform/UrbanchukEconomicImpactofEliminatingtheBiodieselTaxCredit12-3-09.pdf>

Link to comments:

<http://www.whitehouse.gov/sites/default/files/microsites/ceq/AFPA%20Comments%20on%20Federal%20GHG%20Reporting%20Guidance.pdf>

GHG Accounting Comments

